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12 Attorneys for Defendant
13 RAEJOHNE FOSTER

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANGELA CUMMINGS,
Plaintiff,

vs.

VALLEY HEALTH SYSTEM, LLC, a
Delaware Limited-Liability Company d/b/a
DESERT SPRINGS HOSPITAL;
RAEJOHNE FOSTER, an individual,
Defendants.

Case No. 2:13-CV-00479-APG-GWF

**STIPULATION AND PROPOSED ORDER
TO EXTEND THE DEADLINE TO FILE
DISMISSAL PAPERS**

(Second Request)

Defendant RaeJohne Foster (“Foster”) and Plaintiff Angela Cummings (“Cummings”), by
and through their respective counsel of record, hereby stipulate and agree to extend the deadline to
submit dismissal papers by from the current deadline of April 5, 2019 to **May 6, 2019**.

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1 Counsel for both parties recently resolved a final issue related to the terms of the
2 agreement and are awaiting the return of the executed settlement agreement from Plaintiff. A
3 thirty-one day extension is requested to allow sufficient time to finalize the settlement process and
4 file a stipulation of dismissal. This is the second request.

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6 Dated: April 4, 2019

7 Respectfully submitted,

Respectfully submitted,

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9 /s/ James P. Kemp, Esq.

10 JAMES P. KEMP, ESQ.
KEMP & KEMP, ATTORNEYS AT LAW

11 Attorneys for Plaintiff


/s/ Marcus B. Smith, Esq.

12 WENDY MEDURA KRINCEK, ESQ.
13 MARCUS B. SMITH, ESQ.
14 KELSEY E. STEGALL, ESQ.
15 LITTLER MENDELSON, P.C.

16 Attorneys for Defendant

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18 **IT IS SO ORDERD.**

19 Dated this 5th day of April, 2019.

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22 UNITED STATES DISTRICT JUDGE

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